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September 19, 2016

First Class Mail & Email

Region 1 Freedom of Information Officer
U.S. EPA Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912
rlfoia@epa.gov

RE: Freedom of Information Act
PCBs in Massachusetts Schools

Dear Sir or Madam:

Pursuant to the Federal Freedom of Information Act, 5 U.S.C. § 552 *et seq.* ("FOIA"), and the FOIA regulations promulgated by the United States Environmental Protection Agency ("EPA"), 40 CFR § 2.100 *et seq.*, we request the opportunity to inspect and/or receive a photocopy of the following Documents¹ in the possession, custody or control of the EPA:

- All Documents relating to any investigation, sampling, testing, assessment, evaluation, and removal of PCBs or any other hazardous or toxic substances alleged to be present or formerly present at any school in Massachusetts, whether planned or actually completed;
- All correspondence to or from EPA, or anyone purporting to act on behalf of EPA, and any consultant, expert, engineer, or other advisor, whether or not engaged by EPA, relating to the investigation, sampling, testing, assessment, evaluation, and removal of PCBs or any other hazardous or toxic substances alleged to be present or formerly present at any school under the control, directly or indirectly, in whole or in part, of any Massachusetts municipality or the school board of any Massachusetts municipality, whether planned or actually completed, including all Documents referenced therein;
- All correspondence to or from EPA, or anyone purporting to act on behalf of EPA, and any Massachusetts municipality or school board of any other Massachusetts municipality,

¹ "Document" or "Documents" means, all writings of every kind, such as letters, memoranda, reports, studies, correspondence, emails, notations and records of telephone calls and conversations, notes, minutes and records of meetings, diaries, journals, calendars, notebooks, communications, contracts, agreements, bills, inspection reports, and records. The term also includes information stored electronically. Drafts of the foregoing are also included.

relating to or arising out of any investigation, sampling, testing, assessment, evaluation, and removal of PCBs or any other hazardous or toxic substances alleged to be present or formerly present at any school under the control, directly or indirectly, in whole or in part, of any Massachusetts municipality or the school board of any Massachusetts municipality, whether planned or actually completed;

- All field notes, hand-written notes, inspection reports, internal EPA memoranda, sampling results, reports, and evaluations relating to or arising out of the presence, potential presence or former presence of PCBs at a school in Massachusetts;
- All correspondence to or from EPA, or anyone purporting to act on behalf of EPA, and any third parties or other governmental authorities relating to the presence, the potential presence or former presence of PCBs at a school in Massachusetts, including but not limited to the Massachusetts Department of Education, the Massachusetts Department of Public Health and the Massachusetts Department of Environmental Protection, including all Documents referenced therein;
- All requests for information (e.g., FOIA requests) received by EPA relating to the presence, potential presence or former presence of PCBs in schools in Massachusetts, including any responses thereto, from any third parties or other governmental authorities;
- All publicly available information or materials relating to the presence, potential presence or former presence, of PCBs in schools in Massachusetts, including all prior versions of same; and
- All photographs and videos taken, or of any item therein, and all photographs and videos taken which relate to the presence, potential presence or former presence of PCBs at a school in Massachusetts, by EPA or anyone purporting to act on behalf of EPA.

Thank you in advance for your cooperation in this matter. If you should have any questions, please contact me at (617) 748-5213.

Very truly yours,

WHITE AND WILLIAMS LLP



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